

73079-6

11/18/2013

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

NOV 18 2013

OFFICE OF
CHEMICAL SAFETY
AND POLLUTION PREVENTION

Cisse W. Spragins, Ph.D.
Rockwell Labs Ltd
1257 Bedford Avenue
North Kansas City, MO 64116

Subject: Label Notification(s) for Pesticide Registration 98-10 and 2007-4

Dear Dr. Spragins:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 dated September 3, 2013 for the product Green Zone™ Granular Bait. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the action(s) requested fall within the scope of PRN 98-10. The Confidential Statement of Formula (CSF) and/or label submitted with the application has (have been stamped "Notification" and will be placed in our records.

The Agency is in receipt of your Application(s) for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 dated for September 3, 2013 for:

Alternate Brand Name: Maggie's Farm™ Simply Effective™ Snail, Slug and Insect Bait

The Registration Division (RD) has conducted a review of this request for applicability Under PRN 2007-4 and finds that the label change(s) requested falls within the scope of PRN-2007-4. The label has been date-stamped "Notification" and will be placed in our records.

EPA Registration Number: 73079-6 Green Zone™ Granular Bait

Please be reminded that 40 CFR Part 156.140(a)(4) requires that a batch code, lot number, or other code identifying the batch of the pesticide distributed and sold be placed on non-refillable containers. The code may appear either on the label (and can be added by non-notification/PR Notice 98-10) or durably marked on the container itself.

If you have any questions, please contact Melody Banks on 703 305-5413 or via email @banks.melody@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Richard Gebken".

Richard Gebken
Product Manager
Insecticide Branch
Registration Division



Please read instructions on reverse before completing form.

Form Approved. OMB No. 2070-0060

	United States Environmental Protection Agency Washington, DC 20460	<input type="checkbox"/> Registration <input type="checkbox"/> Amendment <input checked="" type="checkbox"/> Other	OPP Identifier Number
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Application for Pesticide - Section I

1. Company/Product Number 73079-6	2. EPA Product Manager Mark Suarez	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Rockwell Labs Ltd / Green Zone (TM) Granular Bait	PM# 13	
5. Name and Address of Applicant (Include ZIP Code) 1257 Bedford Ave North Kansas City, MO 64116 <input type="checkbox"/> Check if this is a new address		6. Expedited Review. In accordance with Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: <div style="text-align: right; font-weight: bold; font-size: 1.2em;"> NOTIFICATION NOV 18 2013 </div> EPA Reg. No. _____ Product Name _____

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

This notification is consistent with PR Notice 98-10 and the requirements of 40 CFR 156.10 and 40 CFR 152.46 and no other changes have been made to the label or Confidential Statement of Formula for this product. I understand it is a violation of 18 U.S.C. Section 1001 to willfully make a false statement to EPA. I further understand that if this notification is not consistent with the guidance of PR Notice 98-10 and the requirements of 40 CFR 156.10 and 40 CFR 152.46, this product may be in violation of FIFRA and may be subject to enforcement action and penalties provided under sections 12 and 14 of FIFRA. See highlighted label copy and attached letter for explanation of changes.

Section - III

1. Material This Product Will Be Packaged In:					
Child-Resistant Packaging <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	2. Type of Container <input type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input checked="" type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____		
* Certification must be submitted		If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt	No. per container
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 1.2 oz, 1 lb, 2 lbs, 4 lbs, 5 lbs, 10 lbs, 20 lbs, 40 lbs, 50 lbs		5. Location of Label Directions <input checked="" type="checkbox"/> _____	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled <input type="checkbox"/> Other _____					

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Cisse W. Spragins, Ph.D.	Title CEO	Telephone No. (Include Area Code) 816 283 3167
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received (Stamped)
2. Signature 	3. Title CEO	
4. Typed Name Cisse W. Spragins, Ph.D.	5. Date 9/3/13	

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September 3, 2013

Document Processing Desk (NOTIF)
Office of Pesticide Programs/EPA
One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202

By Federal Express

PM Team #13

Re: Green Zone™ Granular Bait, 73079-6, 10% Boric Acid
NOTIFICATION of Minor Changes

Dear Sir/Madam:

Attached please find our Notification of minor changes in labeling for the subject product. Please note that we submitted a Notification dated June 4, 2013 for this product to which we have not had a response. The minor label changes noted in that Notification are included on the enclosed label.

We have added an ABN, made some housekeeping changes related to contact info and trademarks and moved the optional marketing claims to a section at the end. We have added some factual-on-their face marketing claims. We have also added refillable container info in the Storage and Disposal section, using the same language approved for the very similar product, InTice Granular Bait 73079-2.

There are no other product or label changes. A highlighted and a clean copy of the label are attached.

Many thanks for your kind attention. Please feel free to contact us at 816 283 3167 or cspragins@rockwelllabs.com with any questions or concerns.

Sincerely,

Rockwell Labs Ltd

Cisse W. Spragins, Ph.D.
CEO

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NOTE: *Bold italicized text is information for the reader and not part of the label.*
[Bracketed information is optional text.] Text separated by / denotes and / or options.

Green Zone™ Granular Bait

ABN: InTice™ 10 Perimeter Bait™

ABN: Maggie's Farm™ Simply Effective™ Snail, Slug and Insect Bait

Kills Roaches, Crickets, Mole Crickets, Sowbugs, Pillbugs, Earwigs, Silverfish, Millipedes, Snails, Slugs and Ants*

*Except Pharaoh ants, Carpenter ants, Fire ants, Harvester ants

Green Zone™ (logo)

NOTIFICATION

NOV 18 2013

Active Ingredient: Orthoboric Acid.....10%
Other Ingredients:.....90%
Total:.....100%

EPA Reg. No.: 73079-6
EPA Est. No.: (as applicable)
Net Contents: 1.2 oz /1/2/4/5/10/20/40/50 lbs

Manufactured by: Rockwell Labs Ltd (logo)
[North] Kansas City, MO 64116
[Phone number / Web address]

[© XXXX] [Trademark ownership statement]

KEEP OUT OF REACH OF CHILDREN

CAUTION

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals: **CAUTION:** Harmful if absorbed through the skin. Causes moderate eye irritation. Avoid contact with skin, eyes or clothing. Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.

First Aid

If in Eyes: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first five minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.

If on Skin or Clothing: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.

Have the product or label with you when calling a Poison Control Center or doctor or going for treatment. In case of emergency, for additional information call 800 858 7378.

Environmental Hazards: Do not apply directly to water, to areas where surface water is present or to intertidal areas below the mean high-water mark. Do not contaminate water when disposing of equipment washwaters or rinsate.

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DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Use Restrictions

In food areas of restaurants, residential, health care, educational, daycare, agricultural buildings, animal rearing and handling establishments, food handling and food processing establishments, this product may only be applied as a crack and crevice treatment. Any product remaining outside of cracks and crevices must be cleaned up and removed.

Application Directions

Use Sites: In and around residential, multi-family, commercial, industrial, municipal, institutional, research, recreational, health care, educational, daycare, hospitality and agricultural buildings and other man-made structures, garages, home greenhouses, transport vehicles, sewers, animal rearing and handling establishments and food handling and food processing establishments. Turf sites include lawns, landscape beds, ornamental turf, parks, playing fields, right-of-ways, golf courses and home greenhouses.

Outdoor Application: Apply bait evenly over the affected area using a hand shaker or mechanical spreader at a rate of 1 lb per 1000 square feet or 45 lbs per acre. The product should not be watered in. For mole cricket treatments, results will be best if the area is irrigated prior to bait treatment. Mole crickets typically come to the surface to feed in the evening. Individual ant mounds may be treated by sprinkling 1/2 oz of product around each mound. Repeat treatment as needed. Apply bait early in the season in areas likely to be infested, such as flower, fruit and vegetable gardens, on ornamental turf and ground cover vegetation, and around shrubs. In home greenhouses, apply bait at a rate of 3 oz per 100 sq ft on and under benches. Do not apply bait directly in flats or pots. Reapply as needed.

Sewer Application: Apply bait along ledges inside sewers and around manhole covers.

Indoor Application: Apply bait only in areas inaccessible to children and pets, or in tamper-resistant bait stations. Apply bait at a rate of 3 oz (2/3 cup) per 100 square feet. Using a hand shaker or duster, apply bait in attics, crawl spaces, trash closets, utility closets, dropped ceilings, on dirt or gravel cellar floors, under and behind appliances and vending machines, in wall voids and voids under and behind cabinets, sinks and tubs, in drawer wells, garbage chutes, pipe chases, elevator pits, around drains, around electrical conduits and in cracks and crevices where insects may harbor. Focus application in areas where insects or their signs are seen. Reapply bait after one week if infestation is still present. A power duster may be used to apply bait in appropriate areas, such as attics and crawlspaces. The duster manufacturer's recommendations for settings should be followed.

Application tips for certain sites follow:

1. In attics, be sure to get bait near the eaves and vent pipes where insects often first enter, as well as around any pipes or potential access points between the attic and the main structure. Attics should have proper ventilation to insure that no food odor from the bait seeps into the living area, particularly in hot weather. If in doubt, apply the product in a manner such that it can be easily removed.
2. When treating cabinetry areas, if there is no gap between the lower cabinets and the kickplate, then small holes can be drilled to access the voids. Escutcheon plates around pipes can also be pulled back to allow access to voids.
3. The bottom drawers in kitchen and bathroom cabinets can be removed and bait dusted into drawer wells. No bait should be left exposed when drawers are replaced.
4. Electrical switch plate covers can be removed to allow access to voids, but bait shouldn't be applied directly in electrical boxes.

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5. If there are cracks between baseboards, cabinets, doorframes, hinges, counters or trim, and walls, these cracks can be lightly dusted with bait. If practical, these areas can be sealed once insect problems have been eliminated, to help prevent future problems.

6. Insects need moisture, so kitchen and bath areas and areas immediately surrounding them, and any other damp areas should be carefully inspected and treated if necessary. As a separate matter from the use of this product, it is advisable to fix any leaks to minimize structural damage and odors, and to prevent potential chronic insect problems.

To help prevent insect problems from developing in homes and similar structures, a preventative program is recommended. Once per year, apply bait in attics and crawlspaces at a rate of 8 oz per 1000 square feet.

Food Processing and Handling Establishment Application, including Federally-Inspected Meat and Poultry Plants: Follow instructions for other sites as appropriate. In food areas, only apply bait in cracks, crevices, and other inaccessible areas. Avoid contamination of food and feedstuffs. Never apply bait directly to a surface where food is stored, prepared or served. Any bait that is left visible after treatment should be swept into cracks and crevices or removed.

Storage and Disposal

Do not contaminate water, food or feed by storage or disposal.

Storage: Store in a dry place. Do not store where children or animals may gain access.

Disposal: If empty: Non-refillable container. Do not reuse or refill this container. Place in trash or offer for recycling if available. If partly filled: Call your local solid waste agency or 1-800-CLEANUP which is managed as a public-private partnership.

[Or, for product sold in hard plastic storage/applicator containers:

This storage/application container may be refilled by the end-user of the product. Refill only with Green Zone Granular Bait.

Disposal: If empty: Non-refillable container. Do not reuse or refill this container. Place in trash or offer for recycling if available. If partly filled: Call your local solid waste agency or 1-800-CLEANUP which is managed as a public-private partnership.]

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[Conditions of Warranty and Limitations of Liability

IMPORTANT: READ BEFORE USE Read the entire Directions for Use, Conditions of Warranties and Limitations of Liability before using this product. If terms are not acceptable, return the unopened product container at once. By using this product, user or buyer accepts the following Conditions, Disclaimer of Warranties and Limitations of Liability.

CONDITIONS: The directions for use of this product are believed to be adequate and must be followed carefully.

However, it is impossible to eliminate all risks associated with the use of this product. Ineffectiveness or other unintended consequences may result because of such factors as weather conditions, presence of other materials, or the manner of use or application, all of which are beyond the control of Manufacturer. All such risks shall be assumed by the user or buyer.

DISCLAIMER OF WARRANTIES: To the extent consistent with applicable law, Manufacturer makes no other warranties, express or implied, of merchantability or of fitness for a particular purpose or otherwise, that extend beyond the statements made on this label. No agent of Manufacturer is authorized to make any warranties beyond those contained herein or to modify the warranties contained herein. To the extent consistent with applicable law, Manufacturer disclaims any liability whatsoever for special, incidental or consequential damages resulting from the use or handling of this product.

LIMITATIONS OF LIABILITY: To the extent consistent with applicable law, the exclusive remedy of the user or buyer for any and all losses, injuries or damages resulting from the use or handling of this product, whether in contract, warranty, tort, negligence, strict liability or otherwise, shall not exceed the purchase price paid or at Manufacturer's election, the replacement of product.]

Marketing Claims

[For Indoor, Outdoor and Turf Use]

[Mold and Moisture Resistant [Bait]]

[Ready-to-Use [Bait]]

[Perimeter [Ant / Insect] Bait™ / Granules]

[Treats [up to] X sq ft] *As factual, based upon the container size and label use rate*

[Treats [up to] X linear feet in a Y foot band] *As factual, based upon the container size and label use rate*

[Double/ Twice the active, compared to 5% orthoboric acid baits]

[WBE Woman Business Enterprise NWBOC Certified (logo)] *As factual based on company certification*

[Made in [the] USA (logo)]

[Crafted in the Heartland (logo)] *When manufactured in Missouri*